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Attorneys for Defendant Amazon Logistics, Inc.,  
incorrectly sued as AMAZON.COM, LLC

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO**

JASMINE MILLER, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

AMAZON.COM, LLC, a Delaware  
Limited Liability Company; and DOES 1  
through 500, inclusive,

Defendants.

Case No. 17-CV-03488-MMC

**CLASS ACTION**

**JOINT REPORT REGARDING STATUS  
OF PENDING STATE COURT ACTION**

Complaint filed: April 11, 2017

Removal date: June 15, 2017

Trial Date: None set

**LAW OFFICES OF RONALD A. MARRON, APLC**

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Counsel for Plaintiff Jasmine Miller, individually and  
on behalf of all others similarly situated

Pursuant to the Court's December 15, 2020 Order maintaining stay (*see* Dkt No. 94), Plaintiff Jasmine Miller ("Plaintiff") and Defendant Amazon Logistics, Inc. (incorrectly sued as Amazon.com LLC) ("Defendant") (together as "the Parties"), by and through their respective counsel, submit the following Joint Report:

The Parties attended a mediation in San Francisco with Tripper Ortman on September 18, 2019. On October 1, 2019, the Parties reached an agreement in principle to settle this case and are currently meeting and conferring regarding a draft long form settlement agreement.

As the contemplated settlement encompasses not only the claims in this matter but also claims in a related PAGA action filed by Plaintiff Miller against Defendant that is pending in Alameda County Superior Court (Case No. RG17856888), the Parties have agreed to amend the complaint in the Miller PAGA action to add the claims herein so that the Alameda Superior Court can process the settlement encompassing the claims in both actions.

At all times since reaching the Settlement, the Parties have been diligently working in earnest to finalize the terms of the proposed Settlement, but additional time is required to allow the Parties time to finalize the balance of the terms of the Settlement Agreement and its exhibits, as well as the Motion for Preliminary Approval of Class and PAGA Action Settlement itself, and draft a consolidated complaint encompassing the claims in the PAGA action and the instant class action. Defendant has reviewed the draft of the consolidated complaint and Plaintiff is in the process of reviewing the changes. The fact that A-1 Express, Inc., dba 1-800 Courier, had declared bankruptcy, presented issues that required further meet and confer between the Parties. However, the Parties have met and conferred as to a resolution of that issue sufficient to finalize the Settlement Agreement and the Motion for Preliminary Approval. Plaintiff is finalizing the Settlement Agreement and its exhibits, as well as the Motion for Preliminary Approval of Class and PAGA Action Settlement, and anticipated providing Defendant drafts within the next two weeks.

Following execution of the long form settlement agreement and the Parties' agreement on the consolidated complaint, the Parties anticipate filing a Motion for Preliminary Approval of Class and PAGA Representative Action Settlement with the Alameda Superior Court

1 within the next sixty (60) days. To allow the Parties further time to complete these steps, the  
2 Parties respectfully request that the Court maintain the stay in this action and set a deadline  
3 of April 6, 2021 for the Parties to file a Joint Report to update the Court on the status of the  
4 Parties' settlement efforts.

5  
6 Dated: February 5, 2021

Respectfully submitted,  
COHELAN KHOURY & SINGER

7 By /s/ J. Jason Hill  
8 J. Jason Hill  
9 Attorneys for Plaintiff JASMINE MILLER

10  
11 Dated: February 5, 2021

MORGAN, LEWIS & BOCKIUS LLP

12 By /s/ Tuyen T. Nguyen Lu  
13 John S. Battenfeld  
14 Brian D. Fahy  
15 Tuyen T. Nguyen Lu  
16 Attorneys for Defendant AMAZON.COM LLC

**Attestation Regarding Signatures**

17 I, J. Jason Hill, attest that all other signatories listed, and on whose behalf this filing is  
18 submitted, concur in the filing's content and have authorized the filing.

19  
20 Dated: February 5, 2021

COHELAN KHOURY & SINGER

21 By /s/ J. Jason Hill  
22 J. Jason Hill  
23 Attorneys for Plaintiff JASMINE MILLER

**PROOF OF SERVICE*****Miller v. Amazon.com, LLC, et al.*****U.S.D.C. Case No. 17-CV-03488-MMC**

I, Karla Sousa, declare as follows:

I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to this action. My business address is 605 C Street, Suite 200, San Diego, CA 92101. On February 5, 2021, I instituted service of the foregoing document(s) described as:

**JOINT REPORT REGARDING STATUS OF PENDING STATE COURT  
ACTION**

on the following parties:

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1 in the following manner (as indicated below):

2 Submitting an electronic version of the document(s) via portable document  
3 format (PDF) to the court at <https://ecf.cand.uscourts.gov>.

4 Service will be deemed effective as provided for by Civil Local Rule 5-1 of  
5 the District Court of California, Northern District.

6 I declare that I am employed in the office of a member of the bar of this  
7 court at whose direction this service is made.

8 Executed February 5, 2021, at San Diego, California.

9   
10 Karla Sousa